

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
v. )  
VLADISLAV KLYUSHIN ) CRIMINAL NO. 21-cr-10104-PBS  
Defendant )  
 )

**FORMALLY RENEWED WRITTEN MOTION FOR ACQUITTAL**

At the Court's suggestion, defendant Vladislav Klyushin formally renews in writing his oral Fed. R. Crim. P. 29(a) motion for judgment of acquittal, made at the close of the government's case and renewed at the close of all evidence, on the grounds that the evidence, viewed most favorably to the government, failed to establish (a) any and all elements of the charged offenses beyond a reasonable doubt, (b) the same single conspiracy alleged in the indictment and (c) venue in this District.

Respectfully submitted,

Vladislav Klyushin,  
By His Attorneys,

/s/ Maksim Nemtsev  
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Dated: Feb. 14, 2023

**CERTIFICATE OF SERVICE**

I, Maksim Nemtsev, hereby certify that on this date, January 14, 2023, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

/s/ Maksim Nemtsev  
Maksim Nemtsev